

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

BRIAN COFFEY)	CASE NO. 1:18-cv-02675
On behalf of himself and all others)	
similarly situated,)	JUDGE CHRISTOPHER A. BOYKO
)	
Plaintiff,)	
v.)	
)	<u>NOTICE OF FILING AND</u>
BUCKEYE SHAKER SQUARE)	<u>UNOPPOSED MOTION FOR</u>
DEVELOPMENT CORPORATION,)	<u>ADDITIONAL TIME</u>
et al.)	
Defendants.)	

The attached "Second Amended Proposed Notice to Potential Opt-Ins and Settlement Class Members," at Exhibit 1, is respectfully submitted in partial compliance with the Court's Order (ECF #35) filed February 14, 2020.

Plaintiff Brian Coffey and Defendants Buckeye Shaker Square Development Corporation and John Hopkins respectfully request an extension to February 28, 2020 for submission of a signed Second Amended Settlement Agreement. The receivership of Buckeye Shaker Square Development Corporation has necessitated changes in the settlement agreement to properly state the agreement and preserve the availability of settlement funds. The requested extension will allow the parties to finalize those changes and obtain signatures on the final document.

Counsel for Defendants Kenneth Johnson and Garnell Jamison has been contacted and has stated that he does not oppose the requested extension.

Respectfully submitted,

s/ Scott D. Perlmutter
Scott D. Perlmutter (0082856)
2012 West 25th Street, Suite 716
Cleveland, OH 44113
216-308-1522
Fax: 888-604-9299
scott@tittlelawfirm.com

s/ Thomas A. Downie
Thomas A. Downie (0033119)
46 Chagrin Falls Plaza #104
Chagrin Falls, Ohio 44022
440-973-9000
tom@chagrinlaw.com

Attorneys for Plaintiff

s/ Elizabeth A. Crosby
BRENT BUCKLEY (0017010)
ELIZABETH A. CROSBY (0041433)
DAVID L. MOORE (0087253)
BUCKLEY KING LPA
1400 Fifth Third Center
600 Superior Avenue, East
Cleveland OH 44114-2652
P: (216) 363-1400; Fax: (216) 579-1020
buckley@buckleyking.com
crosby@buckleyking.com
moore@buckleyking.com

Attorneys for Defendants John Hopkins and
Buckeye Shaker Square Development
Corporation

PROOF OF SERVICE

I certify that on February 20, 2020, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

s/ Scott D. Perlmutter
Scott D. Perlmutter (0082856)